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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:
15 ALL ACTIONS

**DECLARATION OF CHRISTOPHER
CHIOU IN SUPPORT OF OMNIBUS
SEALING STIPULATION
REGARDING DKT. NO. 2072**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

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19 I, Christopher Chiou, declare as follows:

20 1. I am a partner at the law firm of Wilson Sonsini Goodrich & Rosati and attorney
21 of record for Defendants YouTube, LLC and Google LLC (collectively (“YouTube”) in *In Re:*
22 *Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Case No.:
23 4:22-md03047-YGR. I am licensed to practice law in the state of California and am admitted to
24 practice before this Court. I submit this declaration in support of the Omnibus Sealing
25 Stipulation in connection with YouTube’s Declaration of Jenna K. Stokes re Source B (ECF No.
26 2072). I have personal knowledge of the facts set forth in this declaration, and I could and would
27 testify competently to their truth if called upon to do so.

28 2. On June 23, 2025, YouTube filed the Declaration of Jenna K. Stokes re Source B

(ECF No. 2072).

3. I have reviewed the document that YouTube seeks to seal pursuant to the Court's Order Granting Motion to File Under Seal; Setting Sealing Procedures (ECF No. 341). Based on my review of the documents and in consultation with YouTube, I understand there is good cause to seal the following information:

Dkt. No.	Description	Basis for Sealing
2072	Declaration of Jenna K. Stokes re Source B	The redacted portions consist of last names of vendor attorneys who are not counsel of record that, if disclosed, may subject them to harassment. I understand that these individuals could be exposed to unwanted attention, solicitation or harassment, including by individuals who conflate the allegations against the company in this litigation with allegations against specific individuals and that Google employees, for example, have previously been harassed, receiving unsolicited contact with threatening messages, because of the public release of their names and other identifying information. If the vendor attorneys' personal identifying information was shared on the public docket in this case, it could similarly subject them to unwarranted or potentially threatening contact.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Los Angeles, California on July 7, 2025.

/s/ Christopher Chiou
Christopher Chiou